

STRUCTURAL PEST CONTROL REGULATORY OFFICIALS CONFERENCE (SPECROC)

HISTORICAL RECORD

1972

PRESIDENT:

VICE-PRESIDENT:

SECRETARY:

TREASURER:

LOCATION OF ANNUAL MEETING:

Oklahoma City, OK

DATE:

9/12/72 to 9/14/72

HIGHLIGHTS OF MEETING:

\*\*Report from NPCA - Dr. Ralph Heal

\*\*Report from EPA - Harold Alford

\*\*Report from OSHA - James Johnson

\*\*Report from FHA - Fred Bowden

\*\*Oklahoma Pest Control Association report and panel discussion

RESOLUTIONS:

NONE IN HISTORICAL RECORD

MISC:

\*\*Meeting was directed by Richard M. Roberts. States in attendance were Arkansas, California, Florida, Kansas, Louisiana, Maryland, Mississippi, Oklahoma Tennessee and Texas.

The Thirteenth Annual Conference of the National Association of Pest Control Regulatory Officials (formerly State Pest Control Regulatory Officials Conference) met at the Holiday Inn South in Oklahoma City, Oklahoma September 12-14, 1972. The conference was well attended and highly beneficial in terms of information exchanged, program excellence and objectives accomplished. The meetings were presided over by Mr. Richard M. Rogers, Chairman of our host state, Oklahoma.

Forty-nine persons including speakers registered, representing state regulatory agencies, other state and federal agencies, the Oklahoma Pest Control Association, and industry & the National Pest Control Association. Ten states were officially represented as follows: Arkansas, California, Florida, Kansas, Louisiana, Maryland, Mississippi, Oklahoma, Tennessee and Texas.

Program of the  
Thirteenth Annual Meeting  
National Association of Pest Control Regulatory Officials  
September 12-14, 1972  
Tuesday Morning, 12 September

Registration

Invocation - Mr. Richard Frye, Oklahoma Department of Agriculture

Welcome and Introductions - Mr. Richard M. Rogers, Chairman

Report From the National Pest Control Association - Dr. Ralph E. Heal,  
Executive Secretary, NPCA

Report from the Environmental Protection Agency (EPA) - Mr. Harold G. Alford,  
Director, Pesticides Regulation Div., Office of Pesticides Programs, EPA

Tuesday Afternoon, 12 September

Pest Control Law Enforcement and Prosecution in Oklahoma - Mr. Willard Boone,  
District Attorney, Washington County, Oklahoma.

Report From Oklahoma State University Extension Service - Dr. Newt Flora,  
Extension Entomologist.

The Occupational Safety and Health Act - Mr. James P. Johnson, Safety and Health  
Compliance Officer, Occupational Safety & Health Admin., U.S. Dept. of Labor.

Wednesday Morning, 13 September

Report From the Federal Housing Administration - Mr. Fred Bowden, Federal Housing  
Administration Office, Oklahoma City

Oklahoma Pest Control Association: "Pest Control in Oklahoma" - Mr. Dick Parker,  
Past President of Oklahoma Pest Control Association.

Oklahoma Pest Control Association - Panel Discussion, John O'Conner, Dick Parker,  
Arvel Fiske, D. A. (Mac) McCabe.

Thursday, 14 September

Business Meeting: Roll call and Reports from the States. Texas, Mr. Charlie  
Chapman; Mississippi, Mr. Robert McCarty; Arkansas, Mr. Gerald King;  
Maryland, Mr. Turp Garrett; California, Mr. E. C. Sizemore; Tennessee, Mr.  
Claude Jones; Florida, Mr. F. R. Du Chanois; Kansas, Mr. Ed Martinez;  
Oklahoma, Mr. Richard Rogers;

Final Business Meeting.



DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES . . . . .

Emmett S. Roberts, Secretary

STATE OF FLORIDA

Reubin O'D Askew, Governor

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15 May 1973

## MEMORANDUM:

TO: National Association of Pest Control Regulatory Officials -- All Members

FROM: F. R. Du Chanois, Secretary, Florida

SUBJ: Minutes and Notes of 13th Annual Conference in Oklahoma City, Oklahoma

The Thirteenth Annual Conference of the National Association of Pest Control Regulatory Officials (formerly State Pest Control Regulatory Officials Conference) met at the Holiday Inn South in Oklahoma City, Oklahoma on 12 through 14 September 1972. The conference was well attended and highly beneficial in terms of information exchanged, program excellence, and objectives accomplished. The meeting sessions were capably presided over by Mr. Richard M. Rogers, Chairman, of our host state.

### Minutes and Notes of the Thirteenth Annual Meeting\*

#### NATIONAL ASSOCIATION OF PEST CONTROL REGULATORY OFFICIALS

Oklahoma City, Oklahoma

12-14 September 1972

Tuesday Morning, 12 September

#### REGISTRATION

INVOCATION - Mr. Richard Frye, Oklahoma Department of Agriculture

#### WELCOME TO OKLAHOMA and OKLAHOMA CITY

Mr. Richard M. Rogers, Chairman, opened the meeting and introduced Lt. Governor Tom Gray and Commissioner of Agriculture Billy Ray Gowdy, who in turn spoke briefly expressing the state's and their pleasure at having NAPCRO meet in Oklahoma. The members besides being honored were given a warm and hearty welcome to the Great State of Oklahoma and the Capital City by these distinguished officials.

#### INTRODUCTIONS

Forty-nine persons including speakers registered, representing state regulatory agencies (28), other state and federal agencies (6), the Oklahoma Pest Control Association and industry (11), the National Pest Control Association (3). Ten states were officially represented as follows: Arkansas, California, Florida, Kansas, Louisiana, Maryland, Mississippi, Oklahoma, Tennessee, and Texas.

\*For information and use of NAPCRO members only. Information presented herein reflects opinions of individuals and not the Association. It is believed to be correct and inaccuracies or omissions are unintentional. Corrections will gladly be made in the next issue upon request.

REPORT FROM THE NATIONAL PEST CONTROL ASSOCIATION

Dr. Ralph E. Heal, Executive Secretary, NPCA

Dr. Heal quipped that he has agreed to step down the day his successor walks into office. He titled his talk, "Review of pest control at national level" or "What's happening in pest control at the national level."

(1) Developments in insurance field:

A serviceman in Ohio killed himself with "Cyanogas, A-Dust" controlling bees in an attic. His insurance didn't cover fumigation. There is no label clearance for "Cyanogas" for bee control. There is a new pollution exclusion clause in liability insurance policies. Practically any operation covered is excluded if insurance companies want to get dirty. Most, however, continue to give coverage as usual. Dr. Heal recommends buying the pollution exclusion coverage back. (E. C. Sizemore, California, commented their Attorney General ruled that insurance companies couldn't exclude this coverage).

(2) Aldrin and dieldrin registration cancellations:

EPA granted NPCA an opportunity to submit representations for these materials. Really wanted to allow industry to continue the use of aldrin/dieldrin in accordance with good industry practice. He is hopeful the industry will be granted continued use of aldrin/dieldrin for termite control and dieldrin for powder-post beetle control. NPCA is awaiting word from Mr. Ruckelshaus.

(3) Labeling residual pesticides for use in food handling industry (food processing areas):

Diazinon was first to have registration canceled for this use. He thinks some day we will come back to some rules of common sense. Dr. William Upholt, Deputy Administrator of EPA, got NPCA a hearing before an important committee. NPCA developed guidelines for use of pesticides in food processing industry. No report has been released yet, but he understands it will be favorable. Manufacturers will have to obtain residue data for retail sales and service and food manufacturing plant uses.

(4) Concept of sanitation by many regulatory people is that:

(a) Sanitation will kill bugs, and (b) the pest control industry should enforce sa

tation. Sanitation will kill some bugs but not all, and supplemental pesticide measures are necessary. Where proper pest control measures are used or exterminating services employed there are fewer or no bugs. It is not a responsibility of the pest control industry to enforce sanitation regulations.

(5) Federal Environmental Pesticide Control Bill:

There is a hang-up in U.S. Senate. There is an Agriculture Committee version and a Commerce Committee version. The Administration and EPA say they want a bill, but he has failed to see support from Administration for either version or any persuasion to come to understanding or negotiation. Most users are skeptical that we will get a bill this year, and if not in 93rd Congress, they will have to start all over. The basic change is that all uses of pesticides be regulated to the extent that any use inconsistent with the label is prohibited. Dr. Heal expressed the view that tightening of controls will do nothing but bring work and opportunities to the pest control industry. Commerce version of the bill suggests a monopoly-busting binge. All pesticide research and development data would be available to anyone, not privileged information as it is now.

Dr. Heal is in favor of keeping certification program at the supervisory level of responsibility and placing enforcement of regulations for application of restricted pesticides by servicemen on back of employer/supervisor.

NPCA is developing a training program, on a self-instruction basis, which is very fundamental and primarily basic. Concludes with self-testing.

(6) State pest control exams:

A battery of 100 random questions were given at Purdue conference. It was an exercise in academic futility. He advocated examining on industry and work-related subjects. He is opposed to exercises of academic triviality. NPCA material has never been available on industry-wide basis but only to members. Now, Good Practice Statements and Serviceman's Manual have been released and are available as Educational Package on an industry-wide basis. NPCA will send complimentary copy of educational package to AAPCO and pest control regulatory groups. Price to members is \$6.50 and to non-members is \$9.50.

(Ed. Note: A non-member was advised in April 1973 that the price to non-members had been increased to \$30.00).

Discussion:

- Q. Mr. Carlton (Louisiana) - What is EPA's position on supervision of use of restricted pesticides?
  - A. Dr. Heal - Generally, supervisor (certified) doesn't have to be physically present on job, but EPA wants to reserve right to require physical presence for use of certain pesticides and this would appear on label.
  - Q. Mr. Garrett (Maryland) - Should residual pesticides be in professional hands or (also) in hands of home owner?
  - A. Dr. Heal - Thinks they (manufacturers and industry) can establish that there is no significant contamination of food; and there is a better chance that residuals will be used more safely in industry hands. Doesn't think there is a great hazard from home owner use since sodium fluoride (went out of use).
- COFFEE BREAK, courtesy of Velsicol Chemical Corporation, Chicago, Illinois, throughout the entire meeting.  
REPORT FROM THE ENVIRONMENTAL PROTECTION AGENCY (EPA)

Mr. Harold G. Alford, Director, Pesticides Regulation Division, Office of Pesticides Programs, EPA

Mr. Alford addressed himself ably to the Federal Environmental Pesticide Control Act (FEPCA) pending bills before the Congress. (Ed. Note: H. R. Bill 10729 became Public Law 92-516 on 21 October 1972 after the NAPCRO meeting).

The Pesticides Regulation Division is responsible for administering the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The Division has reduced registration applications from 5,000 to 1,000, and the processing time from 4-6 months to 30-60 days.

EPA has five assistant administrators under Mr. William D. Ruckelshaus, Administrator (Ed. Note: now Mr. Russell B. Trane). The office of Categorical Programs including Hazardous Materials Control is under Mr. David D. Dominick, Assistant EPA Administrator. The Office of Pesticides Programs (OPP) is under Dr. William Upholt (Ed. note: now Mr. Henry J. Korp, Deputy Assistant Administrator). The following divisions make up OPP:

- (1) Pesticides Registration Division (Mr. John B. Ritch, Director): This Division



is responsible for registration of pesticide products and establishment of legal pesticide residue tolerances for food and feed crops under the Federal Food, Drug and Cosmetics Act (formerly under FDA). For example, precessing petitions for insecticide residue tolerances in foods exposed during treatment of food handling and service establishments.

(2) Criteria (standards) and Evaluation Division (Dr. Leonard B. Axelrod, Director): This Division is responsible for developing criteria and standards for pesticides registration, conducting internal scientific review of currently registered products, and evaluating pesticide research and monitoring needs and policy. It has a review committee to consider questionable pesticide registrations.

(3) Technical Services Division (Dr. William S. Murray, Director): This Division provides coordinated information systems, data processing, and laboratory service for OPP. It also monitors pesticides in humans, animals, plants, soil, air and water; in other words laboratories and data processing.

(4) Operations Division (Dr. John V. Osmun, Director): This Division is responsible for dealing with the broader problems of pesticide use, distribution, manufacture, and disposal, working through EPA regional offices, state governments, and other federal agencies. The Division will play a key role in implementing the new pesticide law (FEPCA). It is a liaison and coordinating division - coordinating liaison with state agencies, accident investigations, and providing support activities.

Mr. Alford then commented on classification of pesticides and certification of applicators (under FEPCA).

A. Classification of products registered under the act:

(1) General - use and (2) Restricted - use. EPA can restrict certain pesticides and uses to PCO's only (such as 1.0% diazinon dust). Mr. Alford said that he could reasonably assure us that the people who are and will be setting the standards will follow a practical approach and common sense will hopefully prevail. States will be given opportunities to have a voice in the setting of standards.

B. Certification of applicators:

(1) Private applicators and (2) Commercial applicators. EPA will set standards. The states may submit plans for certification to the Administrator for approval. There is strong feeling that this type of preemption of states' rights is not desirable or wanted. EPA will try to administer and apply the law in a fair and sensible manner in cooperation with the states.

Penalties under the law are much greater for commercial applicators than for private applicators (home owners).

Mr. Alford then appraised the situation. If we continue under the present law (FIFRA):

Under appeals procedure, if application for registration is refused and they move to cancel registration, manufacturers may make corrections or request referral to a Scientific Advisory Committee. The Administrator then issues an order. If applicant is ruled against, he may then go to a public hearing (almost a court proceeding). The Hearing examiner (for public hearing) submits report of findings and administrator issues an order based largely on examiner's findings. EPA then either continues the cancelations or backs down and registers the product. The applicant may appeal entire matter to U. S. Court of Appeals.

As a case in point, Mr. Alford reviewed the DDT cancelation proceedings. Final rulings are made at policy or political levels. There were 45,000 pages of testimony. The exceptions to the order of cancelation were public health and quarantine uses. The matter is now before the U. S. Court of Appeals in New Orleans on an appeal from applicant. The same procedure is being followed for aldrin/dieldrin, Mirex, phosphorus paste, and lindane vaporizers. EPA won the latter two cases in public hearings but lost in U. S. Court of Appeals in Chicago.

They have prepared or have in preparation guide lines and compendium to registered pesticides. <sup>This</sup> Will be published under title of EPA Compendium of Registered Pesticides. Accident investigation - National Clearing House for Poison Control Centers says only



about 10 per cent of all accidental pesticide poisonings are reported. EPA hopes to improve reporting procedure and rate of reporting and to make or support investigations of poisonings and other pesticide accidents.

Adjourn for Lunch.

Tuesday Afternoon, 12 September

PEST CONTROL LAW ENFORCEMENT AND PROSECUTION IN OKLAHOMA

Mr. Willard Boone, District Attorney, Washington County, Oklahoma. Mr. Boone added his personal welcome to Oklahoma and expressed appreciation for our attendance.

The Oklahoma pest control law was written in 1953, and recodified and rewritten 23 May 1967. Oklahoma law requires only one license to operate a business. There may be several branch offices operating under that license. This allows for inadequate or no supervision of employees, Mr. Boone opin

Their law requires the reporting of all termite jobs prior to the 10th of each month. If no work was performed, then a negative report is required. There is a five man Pest Control Board, consisting of members from Oklahoma State University, Oklahoma Department of Health, Oklahoma Department of Agriculture and two men from industry. The law does not apply to a person doing his own work at home or by untrained persons whom he hires. The speaker expressed the opinion that Tennessee, Arkansas, Kansas, and Louisiana have very effective laws. He believes the right of injunction is a good feature of the Arkansas law. (Ed. Note: This is also provided in Florida law.)

Mr. Boone suggested with conviction and convincingly that NAPCRO ought to have a continuing study of the strengths and weaknesses of the respective state laws for mutual benefit. Much of the public is easy prey and potential victims of unscrupulous PCO'S or unlicensed operators.

The speaker recommended that the enforcing agency establish friendly relations with State Attorney Generals office, District Attorneys, and other prosecutors to establish a mutual understanding about fraudulent, ineffectual or incompetent operators. Some remarks were

directed toward state associations to take an active, leading role in policing and improving their industry. He recommended that the associations do what they can to support good legislation. Laws work best when interested and concerned citizens lend their support to see that they do work. Request and make it clear that you need prosecuting help if you do. Mr. Boone recommends that a qualified operator personally supervise each job.

He also recommends legislation giving the state the right to proceed by injunction. As an example of injunctive relief, an operator fails to do his job and the court shuts him down because he has shown himself unfit to deal with public. District Attorney Boone recommends a provision in pest control laws for "cumulative remedies" under the laws. This means that remedies under pest control statute are cumulative with remedies under laws already existing. Standard contract forms, setting forth name of agency to be contacted in the event of complaint when there is not substantial compliance, are effective enforcement tools. Finally, the speaker advocated that the Oklahoma State Association maintain strong close liaison and contact with other State Associations. Individually we can do very little, collectively we can do a great deal. Ed. Note: In speaking from long experience, concern and enthusiasm, Mr. Boone's remarks were truly some of the most informative and motivating ever brought to NAPCRO on the subject of enforcement.

REPORT FROM OKLAHOMA STATE UNIVERSITY EXTENSION SERVICE

Dr. Newt Flora, Extension Entomologist

There have been over 200 new pieces of legislation affecting pesticides introduced in the Congress in the past year alone. Regulatory business is about 80% education and 20% regulation. PCO's should be taught identification of insects. As an example from field crop pests, green bug aphids are extremely destructive, whereas the look-alike English grain aphid is actually beneficial in that it stimulates wheat to produce more grain. Recognition of economic versus beneficial insects will be a BIG job. It is a extremely difficult training proposition. Teaching life histories is most important.

(Ed. Note: It was impressive to see how all Oklahoma officials and speakers were taking the problems confronting them very seriously).

Dr. Flora touched on predator-parasite-host relationships in pest management. It has taken as much as three years to get identifications back from Washington with a three months average time. We need to know the factors involved in analysis of damage caused by pests. An example of the economic impact of use of chemicals, 15 to 19 pesticides applications are put on cotton. He has heard of as many as 29. In the future we will be identifying economic thresholds of infestation and damage before applying any pesticides. We are going to have to teach the producer to do this and sell him on the value of it. There is a terrific amount of misapplication, misuse and over-use of pesticides. Five per cent of total land mass and 15 per cent of croplands get pesticide applications.

Urbanites constitute 94% of U.S. population on 8% of the land mass and use 17% of the pesticides. Agriculture uses 50% and the rest <sup>are</sup> used by PCO's. There is much to be done in education on the use, handling and application of chemicals; for example, protective clothing and masks to protect commercial applicators from over-exposure. People will not read labels. There is a need to disseminate information on handling of pesticide spill accidents such as in transportation. Poison Control and Information Centers are partial answer but not the entire answer. The medical profession is now much better educated on antidotes and treatment. We need to educate producers on cost-benefit ratios.

We spend 16.5% of expendable income for groceries which is the lowest level in history. Consumer food costs were 21% in the '30's and have been as high as 27% since WW II. The biggest impact on the environment are people themselves. Must have agricultural chemicals if we are to feed the world and even ourselves. There are 12,000 people starving each day in the world today, and this will be magnified by 10 by the turn of the century.

THE OCCUPATIONAL SAFETY AND HEALTH ACT - Mr. James P. Johnson, Safety and Health Compliance Officer, Occupational Safety and Health Administration, U.S. Department of Labor.

Williams-Steiger Act (1971)

Mr. Johnson spoke on the features and enforcement of the Williams-Steiger Act of 1971. The purpose of the act is to insure a safe and healthy place of employment for all workers. There are 50 million workers in four million establishments. The law affects all employers engaged in interstate commerce. The law provides for a maximum fine of \$10,000 or 6 months imprisonment for wilful violation that results in injury or death of employee. It must be shown that the employer wilfully failed to provide <sup>not</sup> protection by/complying with OSHA standards. There are seven compliance officers for the states of Oklahoma and Arkansas. They select target industries for attention based on accident rates. The five industries having highest national accident rates: longshoremen, sheet metal works, meat and meat packing, mobile home builders, and wood products and construction. OSHA compliance officers come into industry plants as the result of disaster, complaint by employee and lastly by random selection.

They have vertical (specific to industry) and horizontal (general) standards of compliance. State, county and city government employers-employees are presently exempt, but have until December 1972 to submit an acceptable plan. Industry has been encouraged and pleaded with for years to improve health and safety in working conditions but they have failed miserably. The law applies to virtually everybody who hires anybody. Ed.: A lively question and answer period followed.

ADJOURNMENT FOR THE DAY (5:05 P.M.)

ATTITUDE ADJUSTMENT HOUR (6:00 P.M.), courtesy Orkin Exterminating Company, Inc. Atlanta, Georgia.

Wednesday morning 13 September 1973

REPORT FROM THE FEDERAL HOUSING ADMINISTRATION

Mr. Fred Bowden, Federal Housing Administration office, Oklahoma City

Mr. Bowden spoke knowledgeably on FHA insured new housing (proposed construction) and existing housing.

(1) New housing - retreatment: All pretreatment standards are set forth in FHA Form 300 MPS (Minimum Property Standards) presently under revision. These standards and requirements apply throughout the United States. Physical methods (barriers) include (a) concrete and (b) metal shields; chemical methods - (a) treated lumber and (b) soil poisons. Some standards may be modified locally. Builder furnishes FHA a guarantee that building has been treated, and guarantees for five years. MPS require the builder to state he has treated the property or caused it to be treated. FHA can only hold the builder responsible for the construction, treatment, etc. because FHA contract is with the building contractor. FHA holds builder responsible for termite infestation or any other (contract) non-compliance. Warranty issued states that homeowner must first go to builder if he has a complaint. Guarantee provides for repair for one year and (termite) retreatment for five years.

(2) Existing construction - no MPS for existing houses. FHA does not require warranty from contractor or PCO. They require inspection. If inspection is positive they will not insure loan unless property is treated. If inspection is negative they will insure loan.

On existing buildings, all physical termite damage must be repaired even though not infested. They will not accept any inspection report that is over 60 days old. Does not bind termite company because it is a matter of judgment.

OKLAHOMA PEST CONTROL ASSOCIATION:

Mr. Dick Parker, Parker Pest Control, Ponca City, Past President of Oklahoma Pest Control Association, - "Pest Control in Oklahoma".

Mr. Parker outlined the need for pest control technician training schools. The p.c. technician uses hazardous materials. There is a 25-100% turnover in technicians annually. Pest control firms don't have adequate training programs, manuals, etc.

Who should be responsible for training? Federal or state agencies should assist by providing technical information and should be involved in certification of technicians.

Universities and extension service people should participate in training technicians - the man behind the gun. In final analysis the pest control firm should assume the responsibility for training because it is their problem.

Quality pest control operator is caught in a performance standards / price squeeze situation. There is lack of qualified instructors in industry.

What do these people know? Average age is 33 years, average employment is six years, average education is 11th grade. They held two 3-day schools in 1971. School included identification of pests. In a pre-school test 4 out of 19 students passed with 70% passing grade (21% passing with average grade of 74%). In written pre-test 3 out of 15 passed (20%). They gave course and tested on the third day; 12 passed with average grade of 80 per cent. This test was more difficult than the state test. Mr. Parker gave second course test results; these are given below.

Technicians basically weak in all phases--biology, habits, control, identification, and safety. (For control of brown recluse spiders OSU recommends dieldrin with Dursban as poor second choice). The only previous training for most technicians was going on the job with an experienced serviceman. The speaker concluded that training was going to be mandatory in the future and that industry should face up to it.

Schools: August to December 1971 - 3-day schools.

August 1st - preschool test results:	4 of 19 passed identification, 21%, avg. 74%
written pre-test:	3 of 15 passed written test, 20%
after school test	12 of 15 passed written test, 80%
December 2nd-after school test	10 of 13 passed identification, 77%; avg. 79%
"	9 of 15 passed written test, 60%; avg. 71%



OKLAHOMA PEST CONTROL ASSOCIATION - PANEL DISCUSSION:

John O'Conner, Dick Parker, Arvel Fiske, D. A. (Mac) McCabe.

Mr. O'Conner ----- Praised Entomology Department of OSU as their best friends.

Oklahoma Pest Control Act enacted in 1953. Have had three-day training courses in cooperation with OSU for 20 years. They have two options-- appropriations for vigorous enforcement and increased licensing fees, or certification of all persons who must demonstrate their ability to conduct pest control effectively and safely and result in a certified service technician. OPCA believes that local enforcement is the answer or "big brother" will do it for us to their detriment.

Mr. Parker ----- OPCA serves as liasion between members and regulatory agency and university. Have effectively killed extremist pesticide legislation. Education is prime function. Great need is a practical training manual. Aiming toward mandatory certification of 1,200 technicians throughout state.

Mr. Fiske ----- OPCA - has Eastern and Western Chapters which meet monthly. Entire Association meets four or five times a year.

Mr. McCabe ----- What do we expect from our pest control law and what is good about it. Law is a guideline to good procedures and practices. Should give all of the legitimate operators opportunity to do better work and satisfy our customers. Now in process of updating law and regulations.

Mr. O'Conner----- OPCA had 90% voice in the law and "regs" and has advisory board but it hasn't met in 20 years. Have 100 members but have 300-350 operators in state.

Mr. E. C. (Si) Sizemore (California) commented that California requires a 50¢ inspection report stamp, \$1.00 fee with notice of work completed report form, and \$2.00 fee for copy of report sent to anyone.

Mr. Parks Yeats-- Quipped that, "Status quo" is Latin for the mess we're in.

ADJOURN FOR LUNCH:

Thursday, 14 September

BUSINESS MEETING:

Roll call and Reports from the States

TEXAS: Mr. Charlie Chapman

- Texas has 7 member Structural Pest Control Board; 4 industry members, 3 from state-one from Texas A. and M. University, and one each from State Departments of Agriculture and Health. Law took effect September 6, 1971. They have adopted regulations. It is mostly a licensing law. There are no standards. There is \$50 license fee renewable annually. Every business location that has a manager has to have a license. Each serviceman must have an ID card, not transferable, for a \$5.00 annual fee. No photo is required. There are now 1,860 business locations. Grandfather clause (6 Sept. 1971) admitted anyone who had been in business for two years prior to 6 Sept. 1971. 1,700 came in under the grandfather clause. (Mr. Chapman had been in regulatory work with quarantine enforcement for 21 years with Texas Department of Agriculture). The law provides for 5 categories: termites, lawn and ornamental, fumigation, pest control and weed control. The law was pursued, followed and passed by the industry, not by the State of Texas. The law provides for injunctive remedy (relief). Requires vehicle marking painted on with "TEXAS P.C.O. No. and category in which licensed". They give exams in Austin monthly but will change later to every three months. 50% of termite and general pest control examinees pass, lawn and ornamental 30%, fumigation 25%, and weed control 25%. There is no exam fee. There is a \$10.00 duplicate license issuance fee. Constitutionality of law was contested and court ruled it was constitutional. Texas A. and M. University makes up the exam and any board member can submit questions.

MISSISSIPPI: Mr. Robert McCarty

Adopted regulations to require licensing all entomological, and plant pathology and weed control consultants. The law was amended to add weed control. There is a grandfather clause and thereafter will be required to have a degree. They

require a minimum level of 250 ppm, (1 pt./sq. ft. of 0.5% emulsion) or 500 ppm (1 pt./sq. ft. of 1.0% emulsion = chlordane etc.) in soil samples of preconstruction soil treatment jobs.

ARKANSAS: Mr. Gerald King

There were no changes during past year. Law was passed in 1939. The exam fee is \$25/category. The license fee is \$10/ category; \$5 for each agent and solicitor. There is a \$2 fee for each termite job; penalty fee of \$15/house. There is a second notice penalty fee of \$15 and unlimited additional inspection fees. They have four inspectors in addition to Mr. King. They need two additional inspectors.

MARYLAND: Mr. Turp Garrett

Pesticide Use and Application law was passed in 1969. State Board of Agriculture will become separate Dept. of Agriculture on 1 January 1973 headed by a Secretary. They license custom applicators and pest control consultants. There is a fee of \$30/license and will license each branch office. There is a ten-man Pesticide Advisory Board (no legal standing) which is not provided for by law. They have proposed rules and regulations for pest control operators. They will issue business licenses and require insurance limits of \$25/\$50,000 public liability and \$15/\$30,000 property damage. Will require certification. The law provides for six categories - (the same as Texas, plus bird control). There is no exam fee and no minimum standards. Mr. Garrett asked why select minimum standards for termite control only. At present no standard contracts or minimum standards on contracts are required. The law provides no injunction remedy. Their belief is that 80% of the job is educational/training - philosophy is that they are educators and not cops. Federal money for training will probably be funneled to Agricultural Extension Service. Exam questions should be practical and job-oriented. They anticipate licensing 250-300 pest control operators.

**CALIFORNIA: Mr. E. C. (Si) Sizemore**

California has fumigation, general household pests and termite categories. Lawn and ornamental pest control comes under agriculture law. The registrar and executive secretary — can suspend license by registered letter. Inspection report form prescribed by state. The licensee has five days in which to affix 50¢ revenue stamp and send standard SPC inspection report to state. Standard notices of work completed and not completed form(certificate)with \$1.00 revenue stamp affixed is required within five days of completion. Any citizen can obtain a copy of wood-destroying pest inspection report for \$2.00. Reports are destroyed after two years. There is a \$10 fee for field representative exam per category and \$10 license fee; \$25 fee for operator exam and \$20 fee for branch office license ; \$40 fee for principal office and \$20 for branch office. No one can identify or solicit pest control without being certified. Performance of certain aspects can be done by unlicensed persons. The law requires \$25,000 property damage insurance. There are no pollution exclusion clauses in liability policies written in California. Neither are there any care, custody and control exclusions.

**TENNESSEE: Mr. Claude Jones**

General assembly enacted new law in 1972, Tennessee Pest Control Operators Act of 1972. The license fee is based on gross volume of business and is issued to the individual owner. Surety bond requirement is also based on gross volume of business. The Certificate of Liability insurance coverage is likewise based on gross volume of business. They have a termite contract sliding scale reporting fee. The exam fee is \$25/category. The law provides for 1st and 2nd class offices. A first class office must be in the charge of a licensed operator; a second class office can be under the supervision of a first class office. The Tennessee licensing board is composed of seven members.

**FLORIDA: F. R. Du Chanois (See Florida Annual Report)**

**KANSAS: Mr. Ed Martinez**

Fee changes: There is a flat license fee of \$100 for one or more categories.

There were no changes in regulations during the year. General pest control includes vertebrate pests. They do not accept insurance policies with pollution exclusion. Licensee has the option of obtaining a bond or insurance. The surety bond is generally cheaper. They license each branch office separately. Kansas law requires only one technical representative for the entire organization (company). There is a flat \$10 exam fee for one or more categories. The exams are given quarterly. There is about a 25% overall passing average. The practical portion of exam consists of identification of pests. They are attempting to get ID cards with mug shots on them. Kansas also has a pesticides use law which is administered by another agency division and therefore causes some duplication, overlapping and confusion to date.

OKLAHOMA: Mr. Richard (Ric) Rogers

Oklahoma completely revised all pest control exams from true and false to multiple choice questions. Mallis, Handbook of Pest Control, Scientific Guide to Pest Control Operations and NPCA Good Practice Statement are the exam study references. Mr. Albert Thomas (Oklahoma) reported they have someone manufacturing artificial termite tubes. They have discovered these on two occasions. An Alpine Exterminators allegedly makes them.

FINAL BUSINESS MEETING

Maryland volunteered to host next meeting in 1973, subject to confirmation by state agency officials. Alabama was suggested as a possible alternate location. The Secretary was asked to write letters of appreciation to Oklahoma Commissioner of Agriculture and U.S. Department of Agriculture, Gulfport Laboratory. Press releases were handled by the host State local arrangements group.

ADJOURNMENT:

There being no further business, the 13th Annual NAPCRO Meeting was adjourned at 11:30 a.m., 14 September 1972. Submitted by F. R. Du Chanois, Secretary.

THIRTEENTH ANNUAL MEETING  
NATIONAL ASSOCIATION OF PEST CONTROL REGULATORY OFFICIALS  
OKLAHOMA CITY, OKLAHOMA, 12-14 SEPTEMBER 1972  
MEETING OF NATIONAL PEST CONTROL  
REGULATORY OFFICIALS  
September 12-14

Date and location.....September 12-14; Holiday Inn South

Tuesday - September 12:

8:30-9:00 A.M.....Registration  
9:00 A.M.....Invocation; Welcoming Speech  
9:20-10:20 A.M.....National Pest Control Association;  
Dr. Ralph Heal  
10:20-10:45 A.M.....COFFEE BREAK  
10:45-11:45 A.M.....Environmental Protection Agency;  
Harold Alford  
11:45-1:30 P.M.....LUNCH  
1:30-2:15 P.M.....District Attorney from Washington  
County; Willard Boone  
2:15-2:45 P.M.....Oklahoma State University Extension  
Dr. Newt Flora  
2:45-3:10 P.M.....COFFEE BREAK  
3:10-3:40 P.M.....Department of Labor  
  
6:00 P.M.....Attitude Adjustment Hour



Wednesday - September 13:

9:00-9:30 A.M.....Federal Housing Administration  
9:30-10:00 A.M.....Oklahoma Pest Control Association;  
Dick Parker  
10:00-10:30 A.M.....COFFEE BREAK  
10:30-11:30 A.M.....Oklahoma Pest Control Association;  
Panel Discussion  
11:30-1:00 P.M.....Buffet Luncheon Sponsored by  
Oklahoma Pest Control Association  
1:00 P.M.....Tour: Cowboy Hall of Fame,  
Firefighter's Museum,  
Capitol

Thursday - September 14

8:30 A.M.....Business Meeting

## NATIONAL ASSOCIATION OF PEST CONTROL REGULATORY OFFICIALS

OKLAHOMA CITY, OKLAHOMA, 12-14 SEPTEMBER 1972

## ATTENDANCE ROSTER

Harold G. Alford, Director  
Pesticides Regulation Division  
Environmental Protection Agency  
Washington, D. C. 20250

Willard Boone  
District Attorney  
Washington County, Oklahoma

Fred Bowden  
Federal Housing Administration  
U. S. Dept. of Housing and Urban Development  
Oklahoma City, Oklahoma 73105

Richard Carlton  
Louisiana Dept. of Agriculture  
P. O. Box 44153  
Capitol Station  
Baton Rouge, Louisiana 70804

Charlie Chapman, Executive Director  
Texas Structural Pest Control Board  
313 East Anderson Lane, Chevy Chase III  
Austin, Texas 78752

F. R. Du Chanois, Entomologist  
Bureau of Entomology  
Division of Health  
P. O. Box 210  
Jacksonville, Florida 32201

Dr. Newton W. Flora, Extension Entomologist  
Agricultural Extension Service  
Oklahoma State University  
Stillwater, Oklahoma 74074

Wallace T. (Turp) Garrett  
Maryland State Board of Agriculture  
Office of the State Entomologist  
232 Symons Hall  
University of Maryland  
College Park, Maryland 20742

Billy Ray Gowdy, President  
Oklahoma Board of Agriculture  
Boise City, Oklahoma

Clarence Guldner, Jr.  
Kansas State Board of Agriculture  
Division of Entomology  
Route #2  
Clay Center, Kansas 67432

Dr. Ralph E. Heal  
National Pest Control Association  
250 W. Jersey Street  
Elizabeth, New Jersey 07207

James P. Johnson  
Safety and Health Compliance Officer  
Occupational Safety and Health Administration  
U. S. Department of Labor  
420 South Boulder  
Tulsa, Oklahoma 74103

Claude E. Jones  
Division of Plant Industries  
Tennessee State Dept. of Agriculture  
4909 Trousdale Dr.  
Nashville, Tennessee 37220

Gerald King  
Arkansas State Plant Board  
421 $\frac{1}{2}$  West Capitol  
Little Rock, Arkansas 72201

Garland Lee  
Arkansas State Plant Board  
421 $\frac{1}{2}$  West Capitol  
Little Rock, Arkansas 72201

Robert McCarty, General Inspector  
Division of Plant Industry  
Mississippi Department of Agriculture  
and Commerce  
P. O. Box 5207  
State College, Mississippi 39762

Edmund F. Martinez  
District Entomologist  
Kansas State Board of Agriculture  
5851 Hemlock  
Great Bend, Kansas 67530

Thomas L. Proctor  
Velsicol Chemical Company  
3461 Chaparral Drive  
Dallas, Texas 75234

J. S. Putnam  
Virginia Chemicals, Inc.  
34 Townhouse Lane  
Grand Prairie, Texas 75050

Richard (Ric) Rogers  
Plant Industry Division  
Oklahoma State Dept. of Agriculture  
122 State Capitol  
Oklahoma City, Oklahoma 73105

E. C. Sizemore, Assistant Secretary  
Structural Pest Control Board  
1021 "O" Street  
Sacramento, California 92814

Charles L. Smith, Asst. Dir.  
Pesticides Regulation Division  
Environmental Protection Agency  
Washington, D. C. 20250

Albert E. Thomas, Asst. Dir.  
Plant Industry Division  
Oklahoma State Dept. of Agriculture  
122 State Capitol  
Oklahoma City, Oklahoma 73105

William H. Wilson  
B + G Company  
711 E. Hill  
Oklahoma City, Oklahoma 73105

Parks A. Yeats, Director  
Division of Plant Industry  
Oklahoma State Dept. of Agriculture  
122 State Capitol  
Oklahoma City, Oklahoma 73105

ADDITIONAL REPRESENTATIVES OF THE  
OKLAHOMA STATE DEPT. OF AGRICULTURE:

Clyde A. Bower

Craig Campbell

Jim Curtis

Jack Dobson

Richard Frye

Jim Gassaway

Al Garrett

Jim Iglehart

Wilson Kingsberry

H. H. Latham

Jerry M. Legg

John Meharg

R. L. Owens

REPRESENTATIVES OF THE  
OKLAHOMA PEST CONTROL INDUSTRY:

Brad Bradshaw

Jerry Brown

Jack Doris

Arvel A. Fisk

Andy Fugett

S. E. Hill

Tommy Longtail

D. A. McCabe

A. M. McIntosh

John J. O'Conner

Dick Parker

OKLAHOMA PEST CONTROL ASSOCIATION - PANEL DISCUSSION:

John O'Conner, Dick Parker, Arvel Fiske, D. A. (Mac) McCabe.

Mr. O'Conner ----- Praised Entomology Department of OSU as their best friends.

Oklahoma Pest Control Act enacted in 1953. Have had three-day training courses in cooperation with OSU for 20 years. They have two options-- appropriations for vigorous enforcement and increased licensing fees, or certification of all persons who must demonstrate their ability to conduct pest control effectively and safely and result in a certified service technician. OPCA believes that local enforcement is the answer or "big brother" will do it for us to their detriment.

Mr. Parker ----- OPCA serves as liasion between members and regulatory agency and university. Have effectively killed extremist pesticide legislation. Education is prime function. Great need is a practical training manual. Aiming toward mandatory certification of 1200 technicians throughout state

Mr. Fiske ----- OPCA - has Eastern and Western Chapters which meet monthly. Entire Association meets four or five times a year.

Mr. McCabe ----- What do we expect from our pest control law and what is good about it. Law is a guideline to good procedures and practices. Should give all of the legitimate operators opportunity to do better work and satisfy our customers. Now in process of updating law and regulations.

Mr. O'Conner----- OPCA had 90% voice in the law and "regs" and has advisory board but it hasn't met in 20 years. Have 100 members but have 300-350 operators in state.

Mr. E. C. (Si) Sizemore (California) commented that California requires a 50¢ inspection report stamp, \$1.00 fee with notice of work completed report form, and \$2.00 fee for copy of report sent to anyone.

Mr. Parks Yeats-- Quipped that, "Status quo" is Latin for the mess we're in.

ADJOURN FOR LUNCH:

Who should be responsible for training? Federal or state agencies should assist by providing technical information and should be involved in certification of technicians.

Universities and extension service people should participate in training technicians - the man behind the gun. In final analysis the pest control firm should assume the responsibility for training because it is their problem.

Quality pest control operator is caught in a performance standards / price squeeze situation. There is lack of qualified instructors in industry.

What do these people know? Average age is 33 years, average employment is six years, average education is 11th grade. They held two 3-day schools in 1971. School included identification of pests. In a pre-school test 4 out of 19 students passed with 70% passing grade (21% passing with average grade of 74%). In written pre-test 3 out of 15 passed (20%). They gave course and tested on the third day; 12 passed with average grade of 80 per cent. This test was more difficult than the state test. Mr. Parker gave second course test results; these are given below.

Technicians basically weak in all phases--biology, habits, control, identification, and safety. (For control of brown recluse spiders OSU recommends dieldrin with Dursban as poor second choice). The only previous training for most technicians was going on the job with an experienced serviceman. The speaker concluded that training was going to be mandatory in the future and that industry should face up to it.

Schools: August to December 1971 - 3-day schools.

August 1st - preschool test results:	4 of 19 passed identification, 21%, avg. 74%
written pre-test:	3 of 15 passed written test, 20%
after school test	12 of 15 passed written test, 80%
December 2nd-after school test	10 of 13 passed identification, 77%; avg. 79%
"	9 of 15 passed written test, 60%; avg. 71%

Mr. Bowden spoke knowledgeably on FHA insured new housing (proposed construction) and existing housing.

(1) New housing - retreatment: All pretreatment standards are set forth in FHA Form 300 MPS (Minimum Property Standards) presently under revision. These standards and requirements apply throughout the United States. Physical methods (barriers) include (a) concrete and (b) metal shields; chemical methods - (a) treated lumber and (b) soil poisons. Some standards may be modified locally. Builder furnishes FHA a guarantee that building has been treated, and guarantees for five years. MPS require the builder to state he has treated the property or caused it to be treated. FHA can only hold the builder responsible for the construction, treatment, etc. because FHA contract is with the building contractor. FHA holds builder responsible for termite infestation or any other (contract) non-compliance. Warranty issued states that homeowner must first go to builder if he has a complaint. Guarantee provides for repair for one year and (termite) retreatment for five years.

(2) Existing construction - no MPS for existing houses. FHA does not require warranty from contractor or PCO. They require inspection. If inspection is positive they will not insure loan unless property is treated. If inspection is negative they will insure loan.

On existing buildings, all physical termite damage must be repaired even though not infested. They will not accept any inspection report that is over 60 days old. Does not bind termite company because it is a matter of judgment.

OKLAHOMA PEST CONTROL ASSOCIATION:

Mr. Dick Parker, Parker Pest Control, Ponca City, Past President of Oklahoma Pest Control Association, - "Pest Control in Oklahoma".

Mr. Parker outlined the need for pest control technician training schools. The p.c. technician uses hazardous materials. There is a 25-100% turnover in technicians annually. Pest control firms don't have adequate training programs, manuals, etc.



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DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES . . . . .

Emmett S. Roberts, Secretary

STATE OF FLORIDA

Reubin O'D Askew, Governor

# DIVISION OF HEALTH

POST OFFICE BOX 210

JACKSONVILLE, FLORIDA 32201

PHONE (904) 354-3961

Wilson T. Sowder, M.D., M.P.H., Director

15 May 1973

## MEMORANDUM:

TO: National Association of Pest Control Regulatory Officials -- All Members

FROM: F. R. Du Chanois, Secretary, Florida

SUBJ: Minutes and Notes of 13th Annual Conference in Oklahoma City, Oklahoma

The Thirteenth Annual Conference of the National Association of Pest Control Regulatory Officials (formerly State Pest Control Regulatory Officials Conference) met at the Holiday Inn South in Oklahoma City, Oklahoma on 12 through 14 September 1972. The conference was well attended and highly beneficial in terms of information exchanged, program excellence, and objectives accomplished. The meeting sessions were capably presided over by Mr. Richard M. Rogers, Chairman, of our host state.

### Minutes and Notes of the Thirteenth Annual Meeting\*

#### NATIONAL ASSOCIATION OF PEST CONTROL REGULATORY OFFICIALS

Oklahoma City, Oklahoma

12-14 September 1972

Tuesday Morning, 12 September

#### REGISTRATION

INVOCATION - Mr. Richard Frye, Oklahoma Department of Agriculture

#### WELCOME TO OKLAHOMA and OKLAHOMA CITY

Mr. Richard M. Rogers, Chairman, opened the meeting and introduced Lt. Governor Tom Gray and Commissioner of Agriculture Billy Ray Gowdy, who in turn spoke briefly expressing the state's and their pleasure at having NAPCRO meet in Oklahoma. The members besides being honored were given a warm and hearty welcome to the Great State of Oklahoma and the Capital City by these distinguished officials.

#### INTRODUCTIONS

Forty-nine persons including speakers registered, representing state regulatory agencies (28), other state and federal agencies (6), the Oklahoma Pest Control Association and industry (11), the National Pest Control Association (3). Ten states were officially represented as follows: Arkansas, California, Florida, Kansas, Louisiana, Maryland, Mississippi, Oklahoma, Tennessee, and Texas.

\*For information and use of NAPCRO members only. Information presented herein reflects opinions of individuals and not the Association. It is believed to be correct and inaccuracies or omissions are unintentional. Corrections will gladly be made in the next issue upon request.

REPORT FROM THE NATIONAL PEST CONTROL ASSOCIATION

Dr. Ralph E. Heal, Executive Secretary, NPCA

Dr. Heal quipped that he has agreed to step down the day his successor walks into office. He titled his talk, "Review of pest control at national level" or "What's happening in pest control at the national level."

(1) Developments in insurance field:

A serviceman in Ohio killed himself with "Cyanogas, A-Dust" controlling bees in an attic. His insurance didn't cover fumigation. There is no label clearance for "Cyanogas" for bee control. There is a new pollution exclusion clause in liability insurance policies. Practically any operation covered is excluded if insurance companies want to get dirty. Most, however, continue to give coverage as usual. Dr. Heal recommends buying the pollution exclusion coverage back. (E. C. Sizemore, California, commented their Attorney General ruled that insurance companies couldn't exclude this coverage).

(2) Aldrin and dieldrin registration cancellations:

EPA granted NPCA an opportunity to submit representations for these materials. Really wanted to allow industry to continue the use of aldrin/dieldrin in accordance with good industry practice. He is hopeful the industry will be granted continued use of aldrin/dieldrin for termite control and dieldrin for powder-post beetle control. NPCA is awaiting word from Mr. Ruckelshaus.

(3) Labeling residual pesticides for use in food handling industry (food processing areas):

Diazinon was first to have registration canceled for this use. He thinks some day we will come back to some rules of common sense. Dr. William Upholt, Deputy Administrator of EPA, got NPCA a hearing before an important committee. NPCA developed guidelines for use of pesticides in food processing industry. No report has been released yet, but he understands it will be favorable. Manufacturers will have to obtain residue data for retail sales and service and food manufacturing plant uses.

(4) Concept of sanitation by many regulatory people is that:

(a) Sanitation will kill bugs, and (b) the pest control industry should enforce sa

tation. Sanitation will kill some bugs but not all, and supplemental pesticide measures are necessary. Where proper pest control measures are used or exterminating services employed there are fewer or no bugs. It is not a responsibility of the pest control industry to enforce sanitation regulations.

(5) Federal Environmental Pesticide Control Bill:

There is a hang-up in U.S. Senate. There is an Agriculture Committee version and a Commerce Committee version. The Administration and EPA say they want a bill, but he has failed to see support from Administration for either version or any persuasion to come to understanding or negotiation. Most users are skeptical that we will get a bill this year, and if not in 93rd Congress, they will have to start all over. The basic change is that all uses of pesticides be regulated to the extent that any use inconsistent with the label is prohibited. Dr. Heal expressed the view that tightening of controls will do nothing but bring work and opportunities to the pest control industry. Commerce version of the bill suggests a monopoly-busting binge. All pesticide research and development data would be available to anyone, not privileged information as it is now.

Dr. Heal is in favor of keeping certification program at the supervisory level of responsibility and placing enforcement of regulations for application of restricted pesticides by servicemen on back of employer/supervisor.

NPCA is developing a training program, on a self-instruction basis, which is very fundamental and primarily basic. Concludes with self-testing.

(6) State pest control exams:

A battery of 100 random questions were given at Purdue conference. It was an exercise in academic futility. He advocated examining on industry and work-related subjects. He is opposed to exercises of academic triviality. NPCA material has never been available on industry-wide basis but only to members. Now, Good Practice Statements and Serviceman's Manual have been released and are available as Educational Package on an industry-wide basis. NPCA will send complimentary copy of educational package to AAPCO and pest control regulatory groups. Price to members is \$6.50 and to non-members is \$9.50.



(Ed. Note: A non-member was advised in April 1973 that the price to non-members had been increased to \$30.00).

Discussion:

- Q. Mr. Carlton (Louisiana) - What is EPA's position on supervision of use of restricted pesticides?
  - A. Dr. Heal - Generally, supervisor (certified) doesn't have to be physically present on job, but EPA wants to reserve right to require physical presence for use of certain pesticides and this would appear on label.
  - Q. Mr. Garrett (Maryland) - Should residual pesticides be in professional hands or (also) in hands of home owner?
  - A. Dr. Heal - Thinks they (manufacturers and industry) can establish that there is no significant contamination of food; and there is a better chance that residuals will be used more safely in industry hands. Doesn't think there is a great hazard from home owner use since sodium fluoride (went out of use).
- COFFEE BREAK, courtesy of Velsicol Chemical Corporation, Chicago, Illinois, throughout the entire meeting.  
REPORT FROM THE ENVIRONMENTAL PROTECTION AGENCY (EPA)

Mr. Harold G. Alford, Director, Pesticides Regulation Division, Office of Pesticides Programs, EPA

Mr. Alford addressed himself ably to the Federal Environmental Pesticide Control Act (FEPCA) pending bills before the Congress. (Ed. Note: H. R. Bill 10729 became Public Law 92-516 on 21 October 1972 after the NAPCRO meeting).

The Pesticides Regulation Division is responsible for administering the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The Division has reduced registration applications from 5,000 to 1,000, and the processing time from 4-6 months to 30-60 days.

EPA has five assistant administrators under Mr. William D. Ruckelshaus, Administrator (Ed. Note: now Mr. Russell B. Trane). The office of Categorical Programs including Hazardous Materials Control is under Mr. David D. Dominick, Assistant EPA Administrator. The Office of Pesticides Programs (OPP) is under Dr. William Upholt (Ed. note: now Mr. Henry J. Korp, Deputy Assistant Administrator). The following divisions make up OPP:

- (1) Pesticides Registration Division (Mr. John B. Ritch, Director): This Division

is responsible for registration of pesticide products and establishment of legal pesticide residue tolerances for food and feed crops under the Federal Food, Drug and Cosmetics Act (formerly under FDA). For example, precessing petitions for insecticide residue tolerances in foods exposed during treatment of food handling and service establishments.

(2) Criteria (standards) and Evaluation Division (Dr. Leonard B. Axelrod, Director): This Division is responsible for developing criteria and standards for pesticides registration, conducting internal scientific review of currently registered products, and evaluating pesticide research and monitoring needs and policy. It has a review committee to consider questionable pesticide registrations.

(3) Technical Services Division (Dr. William S. Murray, Director): This Division provides coordinated information systems, data processing, and laboratory service for OPP. It also monitors pesticides in humans, animals, plants, soil, air and water; in other words laboratories and data processing.

(4) Operations Division (Dr. John V. Osmun, Director): This Division is responsible for dealing with the broader problems of pesticide use, distribution, manufacture, and disposal, working through EPA regional offices, state governments, and other federal agencies. The Division will play a key role in implementing the new pesticide law (FEPCA). It is a liaison and coordinating division - coordinating liaison with state agencies, accident investigations, and providing support activities.

Mr. Alford then commented on classification of pesticides and certification of applicators (under FEPCA).

A. Classification of products registered under the act:

(1) General - use and (2) Restricted - use. EPA can restrict certain pesticides and uses to PCO's only (such as 1.0% diazinon dust). Mr. Alford said that he could reasonably assure us that the people who are and will be setting the standards will follow a practical approach and common sense will hopefully prevail. States will be given opportunities to have a voice in the setting of standards.



B. Certification of applicators:

(1) Private applicators and (2) Commercial applicators. EPA will set standards. The states may submit plans for certification to the Administrator for approval. There is strong feeling that this type of preemption of states' rights is not desirable or wanted. EPA will try to administer and apply the law in a fair and sensible manner in cooperation with the states.

Penalties under the law are much greater for commercial applicators than for private applicators (home owners).

Mr. Alford then appraised the situation. If we continue under the present law (FIFRA):

Under appeals procedure, if application for registration is refused and they move to cancel registration, manufacturers may make corrections or request referral to a Scientific Advisory Committee. The Administrator then issues an order. If applicant is ruled against, he may then go to a public hearing (almost a court proceeding). The Hearing examiner (for public hearing) submits report of findings and administrator issues an order based largely on examiner's findings. EPA then either continues the cancelations or backs down and registers the product. The applicant may appeal entire matter to U. S. Court of Appeals.

As a case in point, Mr. Alford reviewed the DDT cancelation proceedings. Final rulings are made at policy or political levels. There were 45,000 pages of testimony. The exceptions to the order of cancelation were public health and quarantine uses. The matter is now before the U. S. Court of Appeals in New Orleans on an appeal from applicant. The same procedure is being followed for aldrin/dieldrin, Mirex, phosphorus paste, and lindane vaporizers. EPA won the latter two cases in public hearings but lost in U. S. Court of Appeals in Chicago.

They have prepared or have in preparation guide lines and compendium to registered pesticides. <sup>This</sup> Will be published under title of EPA Compendium of Registered Pesticides. Accident investigation - National Clearing House for Poison Control Centers says only

about 10 per cent of all accidental pesticide poisonings are reported. EPA hopes to improve reporting procedure and rate of reporting and to make or support investigations of poisonings and other pesticide accidents.

Adjourn for Lunch.

Tuesday Afternoon, 12 September

PEST CONTROL LAW ENFORCEMENT AND PROSECUTION IN OKLAHOMA

Mr. Willard Boone, District Attorney, Washington County, Oklahoma. Mr. Boone added his personal welcome to Oklahoma and expressed appreciation for our attendance.

The Oklahoma pest control law was written in 1953, and recodified and rewritten 23 May 1967. Oklahoma law requires only one license to operate a business. There may be several branch offices operating under that license. This allows for inadequate or no supervision of employees, Mr. Boone opin

Their law requires the reporting of all termite jobs prior to the 10th of each month. If no work was performed, then a negative report is required. There is a five man Pest Control Board, consisting of members from Oklahoma State University, Oklahoma Department of Health, Oklahoma Department of Agriculture and two men from industry. The law does not apply to a person doing his own work at home or by untrained persons whom he hires. The speaker expressed the opinion that Tennessee, Arkansas, Kansas, and Louisiana have very effective laws. He believes the right of injunction is a good feature of the Arkansas law. (Ed. Note: This is also provided in Florida law.)

Mr. Boone suggested with conviction and convincingly that NAPCRO ought to have a continuing study of the strengths and weaknesses of the respective state laws for mutual benefit. Much of the public is easy prey and potential victims of unscrupulous PCO'S or unlicensed operators.

The speaker recommended that the enforcing agency establish friendly relations with State Attorney Generals office, District Attorneys, and other prosecutors to establish a mutual understanding about fraudulent, ineffectual or incompetent operators. Some remarks were

directed toward state associations to take an active, leading role in policing and improving their industry. He recommended that the associations do what they can to support good legislation. Laws work best when interested and concerned citizens lend their support to see that they do work. Request and make it clear that you need prosecuting help if you do. Mr. Boone recommends that a qualified operator personally supervise each job.

He also recommends legislation giving the state the right to proceed by injunction. As an example of injunctive relief, an operator fails to do his job and the court shuts him down because he has shown himself unfit to deal with public. District Attorney Boone recommends a provision in pest control laws for "cumulative remedies" under the laws. This means that remedies under pest control statute are cumulative with remedies under laws already existing. Standard contract forms, setting forth name of agency to be contacted in the event of complaint when there is not substantial compliance, are effective enforcement tools. Finally, the speaker advocated that the Oklahoma State Association maintain strong close liaison and contact with other State Associations. Individually we can do very little, collectively we can do a great deal. Ed. Note: In speaking from long experience, concern and enthusiasm, Mr. Boone's remarks were truly some of the most informative and motivating ever brought to NAPCRO on the subject of enforcement.

REPORT FROM OKLAHOMA STATE UNIVERSITY EXTENSION SERVICE

Dr. Newt Flora, Extension Entomologist

There have been over 200 new pieces of legislation affecting pesticides introduced in the Congress in the past year alone. Regulatory business is about 80% education and 20% regulation. PCO's should be taught identification of insects. As an example from field crop pests, green bug aphids are extremely destructive, whereas the look-alike English grain aphid is actually beneficial in that it stimulates wheat to produce more grain. Recognition of economic versus beneficial insects will be a BIG job. It is a extremely difficult training proposition. Teaching life histories is most important.

(Ed. Note: It was impressive to see how all Oklahoma officials and speakers were taking the problems confronting them very seriously).

Dr. Flora touched on predator-parasite-host relationships in pest management. It has taken as much as three years to get identifications back from Washington with a three months average time. We need to know the factors involved in analysis of damage caused by pests. An example of the economic impact of use of chemicals, 15 to 19 pesticides applications are put on cotton. He has heard of as many as 29. In the future we will be identifying economic thresholds of infestation and damage before applying any pesticides. We are going to have to teach the producer to do this and sell him on the value of it. There is a terrific amount of misapplication, misuse and over-use of pesticides. Five per cent of total land mass and 15 per cent of croplands get pesticide applications.

Urbanites constitute 94% of U.S. population on 8% of the land mass and use 17% of the pesticides. Agriculture uses 50% and the rest <sup>are</sup> used by PCO's. There is much to be done in education on the use, handling and application of chemicals; for example, protective clothing and masks to protect commercial applicators from over-exposure. People will not read labels. There is a need to disseminate information on handling of pesticide spill accidents such as in transportation. Poison Control and Information Centers are partial answer but not the entire answer. The medical profession is now much better educated on antidotes and treatment. We need to educate producers on cost-benefit ratios.

We spend 16.5% of expendable income for groceries which is the lowest level in history. Consumer food costs were 21% in the '30's and have been as high as 27% since WW II. The biggest impact on the environment are people themselves. Must have agricultural chemicals if we are to feed the world and even ourselves. There are 12,000 people starving each day in the world today, and this will be magnified by 10 by the turn of the century.

THE OCCUPATIONAL SAFETY AND HEALTH ACT - Mr. James P. Johnson, Safety and Health Compliance Officer, Occupational Safety and Health Administration, U.S. Department of Labor.

Williams-Steiger Act (1971)

Mr. Johnson spoke on the features and enforcement of the Williams-Steiger Act of 1971. The purpose of the act is to insure a safe and healthy place of employment for all workers. There are 50 million workers in four million establishments. The law affects all employers engaged in interstate commerce. The law provides for a maximum fine of \$10,000 or 6 months imprisonment for wilful violation that results in injury or death of employee. It must be shown that the employer wilfully failed to provide <sup>not</sup> protection by/complying with OSHA standards. There are seven compliance officers for the states of Oklahoma and Arkansas. They select target industries for attention based on accident rates. The five industries having highest national accident rates: longshoremen, sheet metal works, meat and meat packing, mobile home builders, and wood products and construction. OSHA compliance officers come into industry plants as the result of disaster, complaint by employee and lastly by random selection.

They have vertical (specific to industry) and horizontal (general) standards of compliance. State, county and city government employers-employees are presently exempt, but have until December 1972 to submit an acceptable plan. Industry has been encouraged and pleaded with for years to improve health and safety in working conditions but they have failed miserably. The law applies to virtually everybody who hires anybody. Ed.: A lively question and answer period followed.

ADJOURNMENT FOR THE DAY (5:05 P.M.)

ATTITUDE ADJUSTMENT HOUR (6:00 P.M.), courtesy Orkin Exterminating Company, Inc. Atlanta, Georgia.

Wednesday morning 13 September 1973

REPORT FROM THE FEDERAL HOUSING ADMINISTRATION

Mr. Fred Bowden, Federal Housing Administration office, Oklahoma City

Mr. Bowden spoke knowledgeably on FHA insured new housing (proposed construction) and existing housing.

(1) New housing - retreatment: All pretreatment standards are set forth in FHA Form 300 MPS (Minimum Property Standards) presently under revision. These standards and requirements apply throughout the United States. Physical methods (barriers) include (a) concrete and (b) metal shields; chemical methods - (a) treated lumber and (b) soil poisons. Some standards may be modified locally. Builder furnishes FHA a guarantee that building has been treated, and guarantees for five years. MPS require the builder to state he has treated the property or caused it to be treated. FHA can only hold the builder responsible for the construction, treatment, etc. because FHA contract is with the building contractor. FHA holds builder responsible for termite infestation or any other (contract) non-compliance. Warranty issued states that homeowner must first go to builder if he has a complaint. Guarantee provides for repair for one year and (termite) retreatment for five years.

(2) Existing construction - no MPS for existing houses. FHA does not require warranty from contractor or PCO. They require inspection. If inspection is positive they will not insure loan unless property is treated. If inspection is negative they will insure loan.

On existing buildings, all physical termite damage must be repaired even though not infested. They will not accept any inspection report that is over 60 days old. Does not bind termite company because it is a matter of judgment.

OKLAHOMA PEST CONTROL ASSOCIATION:

Mr. Dick Parker, Parker Pest Control, Ponca City, Past President of Oklahoma Pest Control Association, - "Pest Control in Oklahoma".

Mr. Parker outlined the need for pest control technician training schools. The p.c. technician uses hazardous materials. There is a 25-100% turnover in technicians annually. Pest control firms don't have adequate training programs, manuals, etc.



Who should be responsible for training? Federal or state agencies should assist by providing technical information and should be involved in certification of technicians.

Universities and extension service people should participate in training technicians - the man behind the gun. In final analysis the pest control firm should assume the responsibility for training because it is their problem.

Quality pest control operator is caught in a performance standards / price squeeze situation. There is lack of qualified instructors in industry.

What do these people know? Average age is 33 years, average employment is six years, average education is 11th grade. They held two 3-day schools in 1971. School included identification of pests. In a pre-school test 4 out of 19 students passed with 70% passing grade (21% passing with average grade of 74%). In written pre-test 3 out of 15 passed (20%). They gave course and tested on the third day; 12 passed with average grade of 80 per cent. This test was more difficult than the state test. Mr. Parker gave second course test results; these are given below.

Technicians basically weak in all phases--biology, habits, control, identification, and safety. (For control of brown recluse spiders OSU recommends dieldrin with Dursban as poor second choice). The only previous training for most technicians was going on the job with an experienced serviceman. The speaker concluded that training was going to be mandatory in the future and that industry should face up to it.

Schools: August to December 1971 - 3-day schools.

August 1st - preschool test results:	4 of 19 passed identification, 21%, avg. 74%
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OKLAHOMA PEST CONTROL ASSOCIATION - PANEL DISCUSSION:

John O'Conner, Dick Parker, Arvel Fiske, D. A. (Mac) McCabe.

Mr. O'Conner ----- Praised Entomology Department of OSU as their best friends.

Oklahoma Pest Control Act enacted in 1953. Have had three-day training courses in cooperation with OSU for 20 years. They have two options-- appropriations for vigorous enforcement and increased licensing fees, or certification of all persons who must demonstrate their ability to conduct pest control effectively and safely and result in a certified service technician. OPCA believes that local enforcement is the answer or "big brother" will do it for us to their detriment.

Mr. Parker ----- OPCA serves as liasion between members and regulatory agency and university. Have effectively killed extremist pesticide legislation. Education is prime function. Great need is a practical training manual. Aiming toward mandatory certification of 1,200 technicians throughout state.

Mr. Fiske ----- OPCA - has Eastern and Western Chapters which meet monthly. Entire Association meets four or five times a year.

Mr. McCabe ----- What do we expect from our pest control law and what is good about it. Law is a guideline to good procedures and practices. Should give all of the legitimate operators opportunity to do better work and satisfy our customers. Now in process of updating law and regulations.

Mr. O'Conner----- OPCA had 90% voice in the law and "regs" and has advisory board but it hasn't met in 20 years. Have 100 members but have 300-350 operators in state.

Mr. E. C. (Si) Sizemore (California) commented that California requires a 50¢ inspection report stamp, \$1.00 fee with notice of work completed report form, and \$2.00 fee for copy of report sent to anyone.

Mr. Parks Yeats-- Quipped that, "Status quo" is Latin for the mess we're in.

ADJOURN FOR LUNCH:

Thursday, 14 September

BUSINESS MEETING:

Roll call and Reports from the States

TEXAS: Mr. Charlie Chapman

- Texas has 7 member Structural Pest Control Board; 4 industry members, 3 from state-one from Texas A. and M. University, and one each from State Departments of Agriculture and Health. Law took effect September 6, 1971. They have adopted regulations. It is mostly a licensing law. There are no standards. There is \$50 license fee renewable annually. Every business location that has a manager has to have a license. Each serviceman must have an ID card, not transferable, for a \$5.00 annual fee. No photo is required. There are now 1,860 business locations. Grandfather clause (6 Sept. 1971) admitted anyone who had been in business for two years prior to 6 Sept. 1971. 1,700 came in under the grandfather clause. (Mr. Chapman had been in regulatory work with quarantine enforcement for 21 years with Texas Department of Agriculture). The law provides for 5 categories: termites, lawn and ornamental, fumigation, pest control and weed control. The law was pursued, followed and passed by the industry, not by the State of Texas. The law provides for injunctive remedy (relief). Requires vehicle marking painted on with "TEXAS P.C.O. No. and category in which licensed". They give exams in Austin monthly but will change later to every three months. 50% of termite and general pest control examinees pass, lawn and ornamental 30%, fumigation 25%, and weed control 25%. There is no exam fee. There is a \$10.00 duplicate license issuance fee. Constitutionality of law was contested and court ruled it was constitutional. Texas A. and M. University makes up the exam and any board member can submit questions.

MISSISSIPPI: Mr. Robert McCarty

Adopted regulations to require licensing all entomological, and plant pathology and weed control consultants. The law was amended to add weed control. There is a grandfather clause and thereafter will be required to have a degree. They

require a minimum level of 250 ppm, (1 pt./sq. ft. of 0.5% emulsion) or 500 ppm (1 pt./sq. ft. of 1.0% emulsion = chlordane etc.) in soil samples of preconstruction soil treatment jobs.

ARKANSAS: Mr. Gerald King

There were no changes during past year. Law was passed in 1939. The exam fee is \$25/category. The license fee is \$10/ category; \$5 for each agent and solicitor. There is a \$2 fee for each termite job; penalty fee of \$15/house. There is a second notice penalty fee of \$15 and unlimited additional inspection fees. They have four inspectors in addition to Mr. King. They need two additional inspectors.

MARYLAND: Mr. Turp Garrett

Pesticide Use and Application law was passed in 1969. State Board of Agriculture will become separate Dept. of Agriculture on 1 January 1973 headed by a Secretary. They license custom applicators and pest control consultants. There is a fee of \$30/license and will license each branch office. There is a ten-man Pesticide Advisory Board (no legal standing) which is not provided for by law. They have proposed rules and regulations for pest control operators. They will issue business licenses and require insurance limits of \$25/\$50,000 public liability and \$15/\$30,000 property damage. Will require certification. The law provides for six categories - (the same as Texas, plus bird control). There is no exam fee and no minimum standards. Mr. Garrett asked why select minimum standards for termite control only. At present no standard contracts or minimum standards on contracts are required. The law provides no injunction remedy. Their belief is that 80% of the job is educational/training - philosophy is that they are educators and not cops. Federal money for training will probably be funneled to Agricultural Extension Service. Exam questions should be practical and job-oriented. They anticipate licensing 250-300 pest control operators.

**CALIFORNIA: Mr. E. C. (Si) Sizemore**

California has fumigation, general household pests and termite categories. Lawn and ornamental pest control comes under agriculture law. The registrar and executive secretary — can suspend license by registered letter. Inspection report form prescribed by state. The licensee has five days in which to affix 50¢ revenue stamp and send standard SPC inspection report to state. Standard notices of work completed and not completed form(certificate)with \$1.00 revenue stamp affixed is required within five days of completion. Any citizen can obtain a copy of wood-destroying pest inspection report for \$2.00. Reports are destroyed after two years. There is a \$10 fee for field representative exam per category and \$10 license fee; \$25 fee for operator exam and \$20 fee for branch office license ; \$40 fee for principal office and \$20 for branch office. No one can identify or solicit pest control without being certified. Performance of certain aspects can be done by unlicensed persons. The law requires \$25,000 property damage insurance. There are no pollution exclusion clauses in liability policies written in California. Neither are there any care, custody and control exclusions.

**TENNESSEE: Mr. Claude Jones**

General assembly enacted new law in 1972, Tennessee Pest Control Operators Act of 1972. The license fee is based on gross volume of business and is issued to the individual owner. Surety bond requirement is also based on gross volume of business. The Certificate of Liability insurance coverage is likewise based on gross volume of business. They have a termite contract sliding scale reporting fee. The exam fee is \$25/category. The law provides for 1st and 2nd class offices. A first class office must be in the charge of a licensed operator; a second class office can be under the supervision of a first class office. The Tennessee licensing board is composed of seven members.

**FLORIDA: F. R. Du Chanois (See Florida Annual Report)**

**KANSAS: Mr. Ed Martinez**

Fee changes: There is a flat license fee of \$100 for one or more categories.

There were no changes in regulations during the year. General pest control includes vertebrate pests. They do not accept insurance policies with pollution exclusion. Licensee has the option of obtaining a bond or insurance. The surety bond is generally cheaper. They license each branch office separately. Kansas law requires only one technical representative for the entire organization (company). There is a flat \$10 exam fee for one or more categories. The exams are given quarterly. There is about a 25% overall passing average. The practical portion of exam consists of identification of pests. They are attempting to get ID cards with mug shots on them. Kansas also has a pesticides use law which is administered by another agency division and therefore causes some duplication, overlapping and confusion to date.

OKLAHOMA: Mr. Richard (Ric) Rogers

Oklahoma completely revised all pest control exams from true and false to multiple choice questions. Mallis, Handbook of Pest Control, Scientific Guide to Pest Control Operations and NPCA Good Practice Statement are the exam study references. Mr. Albert Thomas (Oklahoma) reported they have someone manufacturing artificial termite tubes. They have discovered these on two occasions. An Alpine Exterminators allegedly makes them.

FINAL BUSINESS MEETING

Maryland volunteered to host next meeting in 1973, subject to confirmation by state agency officials. Alabama was suggested as a possible alternate location. The Secretary was asked to write letters of appreciation to Oklahoma Commissioner of Agriculture and U.S. Department of Agriculture, Gulfport Laboratory. Press releases were handled by the host State local arrangements group.

ADJOURNMENT:

There being no further business, the 13th Annual NAPCRO Meeting was adjourned at 11:30 a.m., 14 September 1972. Submitted by F. R. Du Chanois, Secretary.



THIRTEENTH ANNUAL MEETING  
NATIONAL ASSOCIATION OF PEST CONTROL REGULATORY OFFICIALS  
OKLAHOMA CITY, OKLAHOMA, 12-14 SEPTEMBER 1972  
MEETING OF NATIONAL PEST CONTROL  
REGULATORY OFFICIALS  
September 12-14

Date and location.....September 12-14; Holiday Inn South

Tuesday - September 12:

8:30-9:00 A.M.....Registration  
9:00 A.M.....Invocation; Welcoming Speech  
9:20-10:20 A.M.....National Pest Control Association;  
Dr. Ralph Heal  
10:20-10:45 A.M.....COFFEE BREAK  
10:45-11:45 A.M.....Environmental Protection Agency;  
Harold Alford  
11:45-1:30 P.M.....LUNCH  
1:30-2:15 P.M.....District Attorney from Washington  
County; Willard Boone  
2:15-2:45 P.M.....Oklahoma State University Extension  
Dr. Newt Flora  
2:45-3:10 P.M.....COFFEE BREAK  
3:10-3:40 P.M.....Department of Labor  
  
6:00 P.M.....Attitude Adjustment Hour

Wednesday - September 13:

9:00-9:30 A.M.....Federal Housing Administration  
9:30-10:00 A.M.....Oklahoma Pest Control Association;  
Dick Parker  
10:00-10:30 A.M.....COFFEE BREAK  
10:30-11:30 A.M.....Oklahoma Pest Control Association;  
Panel Discussion  
11:30-1:00 P.M.....Buffet Luncheon Sponsored by  
Oklahoma Pest Control Association  
1:00 P.M.....Tour: Cowboy Hall of Fame,  
Firefighter's Museum,  
Capitol

Thursday - September 14

8:30 A.M.....Business Meeting

## NATIONAL ASSOCIATION OF PEST CONTROL REGULATORY OFFICIALS

OKLAHOMA CITY, OKLAHOMA, 12-14 SEPTEMBER 1972

## ATTENDANCE ROSTER

Harold G. Alford, Director  
Pesticides Regulation Division  
Environmental Protection Agency  
Washington, D. C. 20250

Willard Boone  
District Attorney  
Washington County, Oklahoma

Fred Bowden  
Federal Housing Administration  
U. S. Dept. of Housing and Urban Development  
Oklahoma City, Oklahoma 73105

Richard Carlton  
Louisiana Dept. of Agriculture  
P. O. Box 44153  
Capitol Station  
Baton Rouge, Louisiana 70804

Charlie Chapman, Executive Director  
Texas Structural Pest Control Board  
313 East Anderson Lane, Chevy Chase III  
Austin, Texas 78752

F. R. Du Chanois, Entomologist  
Bureau of Entomology  
Division of Health  
P. O. Box 210  
Jacksonville, Florida 32201

Dr. Newton W. Flora, Extension Entomologist  
Agricultural Extension Service  
Oklahoma State University  
Stillwater, Oklahoma 74074

Wallace T. (Turp) Garrett  
Maryland State Board of Agriculture  
Office of the State Entomologist  
232 Symons Hall  
University of Maryland  
College Park, Maryland 20742

Billy Ray Gowdy, President  
Oklahoma Board of Agriculture  
Boise City, Oklahoma

Clarence Guldner, Jr.  
Kansas State Board of Agriculture  
Division of Entomology  
Route #2  
Clay Center, Kansas 67432

Dr. Ralph E. Heal  
National Pest Control Association  
250 W. Jersey Street  
Elizabeth, New Jersey 07207

James P. Johnson  
Safety and Health Compliance Officer  
Occupational Safety and Health Administration  
U. S. Department of Labor  
420 South Boulder  
Tulsa, Oklahoma 74103

Claude E. Jones  
Division of Plant Industries  
Tennessee State Dept. of Agriculture  
4909 Trousdale Dr.  
Nashville, Tennessee 37220

Gerald King  
Arkansas State Plant Board  
421 $\frac{1}{2}$  West Capitol  
Little Rock, Arkansas 72201

Garland Lee  
Arkansas State Plant Board  
421 $\frac{1}{2}$  West Capitol  
Little Rock, Arkansas 72201

Robert McCarty, General Inspector  
Division of Plant Industry  
Mississippi Department of Agriculture  
and Commerce  
P. O. Box 5207  
State College, Mississippi 39762

Edmund F. Martinez  
District Entomologist  
Kansas State Board of Agriculture  
5851 Hemlock  
Great Bend, Kansas 67530

Thomas L. Proctor  
Velsicol Chemical Company  
3461 Chaparral Drive  
Dallas, Texas 75234

J. S. Putnam  
Virginia Chemicals, Inc.  
34 Townhouse Lane  
Grand Prairie, Texas 75050

Richard (Ric) Rogers  
Plant Industry Division  
Oklahoma State Dept. of Agriculture  
122 State Capitol  
Oklahoma City, Oklahoma 73105

E. C. Sizemore, Assistant Secretary  
Structural Pest Control Board  
1021 "O" Street  
Sacramento, California 92814

Charles L. Smith, Asst. Dir.  
Pesticides Regulation Division  
Environmental Protection Agency  
Washington, D. C. 20250

Albert E. Thomas, Asst. Dir.  
Plant Industry Division  
Oklahoma State Dept. of Agriculture  
122 State Capitol  
Oklahoma City, Oklahoma 73105

William H. Wilson  
B + G Company  
711 E. Hill  
Oklahoma City, Oklahoma 73105

Parks A. Yeats, Director  
Division of Plant Industry  
Oklahoma State Dept. of Agriculture  
122 State Capitol  
Oklahoma City, Oklahoma 73105

ADDITIONAL REPRESENTATIVES OF THE  
OKLAHOMA STATE DEPT. OF AGRICULTURE:

Clyde A. Bower

Craig Campbell

Jim Curtis

Jack Dobson

Richard Frye

Jim Gassaway

Al Garrett

Jim Iglehart

Wilson Kingsberry

H. H. Latham

Jerry M. Legg

John Meharg

R. L. Owens

REPRESENTATIVES OF THE  
OKLAHOMA PEST CONTROL INDUSTRY:

Brad Bradshaw

Jerry Brown

Jack Doris

Arvel A. Fisk

Andy Fugett

S. E. Hill

Tommy Longtail

D. A. McCabe

A. M. McIntosh

John J. O'Conner

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